

Codilis & Moody, P.C.
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Houston, TX 77070 (281) 925-5200
ATTORNEYS FOR SECURED CREDITOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: CASE NO. 24-32537
Shawnda Elizabeth Richardson §
DEBTOR CHAPTER 13

OBJECTION TO CONFIRMATION

(Related to Docket No. 25)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2005-R8, its successors and/or assigns (“Creditor”), secured creditor and party in interest in the above referenced case, files this Objection to Confirmation. In support of its Objection, Creditor respectfully shows:

1. Creditor retains a purchase money security interest in the real property located at 1635 W DONOVAN ST, HOUSTON, TX, 77091. Creditor intends to file its Proof of Claim with proper documentation for \$25,792.17 in pre-petition arrearages on the debt owed to it.
2. The Chapter 13 Plan provides for pre-petition arrearages in the amount of \$24,533.76 to Creditor.
3. The Plan as proposed does not adequately comply with 11 U.S.C §1322(b)(2) and (5) as it does not adequately protect Creditor’s interest in this collateral.
4. The Plan does not comply with 11 U.S.C §1325(a)(6) because it is not feasible as it does not adequately fund payment in full of Creditor’s prepetition arrearage claim.
5. The Plan does not comply with 11 U.S.C. § 1325(a)(3) as it has not been proposed in good faith.

WHEREFORE, Creditor respectfully requests an Order sustaining its Objection to Confirmation and for such other relief to which Creditor may show itself justly entitled, either at law or in equity.

Respectfully submitted,

Codilis & Moody, P.C.

By: /s/ Kathryn N. Dahlin

Kathryn N. Dahlin SBOT#24053165

Kerrie S. Mattson-Neal ARDC#6270224

Nicole Bartee SBOT#24001674

Marla A. Skeltis SBOT#24136182

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File No. 44-24-00213

ATTORNEYS FOR SECURED CREDITOR

NOTE: This law firm is a debt collector.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Objection to Confirmation was served on 7/29/2024 to the following parties at the addresses indicated by deposit in the United States Mail, first class postage prepaid, and/or by electronic notice on 7/29/2024.

Shawnda Elizabeth Richardson
1635 W Donovan St
Houston, TX 77091
DEBTOR

Karen Kisch
6915 Kelsey Rae Court
Houston, TX 77069
ATTORNEY FOR DEBTOR

Tiffany D Castro
9821 Katy Freeway, Ste 590
Houston, TX 77024
CHAPTER 13 TRUSTEE

UNITED STATES TRUSTEE
515 RUSK SUITE 3516
HOUSTON, TX 77002

PARTIES REQUESTING NOTICE:
PHH Mortgage Corporation

1 Mortgage Way
Mount Laurel, NJ 08054
SECURED CREDITOR

Codilis & Moody, P.C.

/s/ Kathryn N. Dahlin
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Kerrie S. Mattson-Neal ARDC#6270224
Nicole Bartee SBOT#24001674
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